

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	CASE NO: 1:05-CR-10175-WGY
	)	
Plaintiff,	)	EMERGENCY MOTION
	)	
v.	)	
	)	
NADINE J. GRIFFIN,	)	
	)	
Defendant.	)	
	)	

**EX PARTE EMERGENCY MOTION FOR LEAVE TO APPEAR  
PRO HAC VICE AND WAIVER OF REQUIREMENT  
FOR APPLICATION TO BE ON MOTION OF A MEMBER OF THE BAR**

Comes now attorney Jeffrey A. Dickstein, a member of the bar in good standing of the State of California, who moves the Court for an ex parte order allowing him to appear pro hac vice in the above entitled case. In support thereof, the following showing is made:

1. Jeffrey A. Dickstein is an attorney licensed by the State Bar of California, Bar No. 70638.
2. His address, phone number and e-mail address are 500 W. Bradley Rd., C-208, Fox Point, WI 53217, (414) 446-4264, jdlaw@wi.rr.com.
3. Jeffrey A. Dickstein is a member in good standing of the following bars:

(A)	Supreme Court of California	December 22, 1976
(B)	U.S.D.C. E.D. Cal	October 10, 1989
(C)	U.S.D.C. C.D. Cal	March 29, 1982
(D)	U.S.D.C. S.D. Cal	November 7, 1989
(E)	U.S.D.C. S.D. Ind	June 24, 1996
(F)	U.S.D.C. N.D. Ind	May 11, 2005

(G)	U.S.D.C. E.D. Mich	June 23, 1994
(H)	U.S.D.C. E.D. Wisc	January 28, 1997
(I)	US Court of Appeals, 5th Cir	January 19, 2006
(J)	US Court of Appeals, 6th Cir	March 6, 1990
(K)	US Court of Appeals, 7th Cir	August 11, 1989
(L)	US Court of Appeals, 8th Cir	March 23, 1992
(M)	US Court of Appeals, 9th Cir	December 20, 1985
(N)	US Court of Appeals, 10th Cir	August 9, 1989
(O)	U.S. Tax Court	July 12, 1985

4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

6. I seek waiver of the requirement that my application be on motion by a member of the bar of this court based on the emergency nature of this application.

7. I was contacted August 4, 2008 by a friend of the Defendant who advised me of the Judgment of this Court dated July 23, 2008 (Doc. 173) and the Court's missive dated July 22, 2008.

8. The ten day period for the filing of a notice of appeal expires August 6, 2008.

9. Unless this application for admission pro hac vice is granted on an emergency basis, the time for Defendant to file her Notice of Appeal will expire.

10. Applicant does not know any attorneys who are members of the Bar of this Federal District.

11. There is insufficient time to proceed by normal requirements to be admitted pro hac vice and to register for the ECF filing system before the notice of appeal, to be timely, must be filed.


12. Applicant seeks admission pro hac vice for the purpose of timely filing a notice of appeal and a motion for bail pending appeal to prevent the Defendant from being held in custody beyond the time she would serve if sentenced to the twenty-one month period of incarceration per the Court's missive of July 22, 2008 (Doc. 172).

13. I contacted the Bernhoft law firm this date. They advised they had represented Defendant pro bono, were not going to do further work, and their schedule prevented them from doing more work.

14. I also contacted the attorney for the United States, Christopher J. Maietta by telephone this date and advised him I intended to file this motion and the notice of appeal.

WHEREFORE, for all the reasons herein stated, applicant moves the Court for an Order allowing him to appear pro hac vice.

Dated: August 4, 2008.

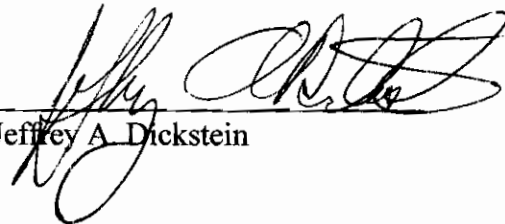


Jeffrey A. Dickstein  
Pro Hac Vice Applicant Attorney  
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jdlaw@wi.rr.com

**CERTIFICATE OF SERVICE**

I hereby certify that on August 4, 2008, I sent a copy of the foregoing document to the attorney of record for the United States by e-mail to Christopher.J.Maietta@usdoj.gov and by first class mail to:

Christopher Maietta  
U.S. Dept. Of Justice, Tax Division  
601 D Street, NW  
Room 7012  
Washington, D.C. 20004



Jeffrey A. Dickstein